

HARVEY FISHBEIN
ATTORNEY AT LAW

111 BROADWAY, SUITE 701
NEW YORK, NEW YORK 10006
TEL: (212) 233-9555
FAX: (212) 374-1506
HF@HARVEYFISHBEIN.COM

May 11, 2020

VIA ECF

Honorable John G. Koeltl
United States District Judge
500 Pearl Street
New York, NY 10007

Re: USA v. David Espinal et al
19 Cr. 428

Dear Judge Koeltl:

I am one of the attorneys for David Espinal in the above-referenced matter. The case is scheduled for a conference before Your Honor on Tuesday, May 19, 2020 at 12 PM. I have spoken with counsel for Michael Castillo, the co-defendant in the above matter, and on behalf of both defendants, I respectfully request that the matter be adjourned to July 21, 22, or 23 at a time convenient to all parties.

As the Court is aware, the COVID-19 pandemic has placed severe restrictions on the ability of counsel to confer and meet with our clients to review this matter. Accordingly, we must request the adjournment and consent to the exclusion of time.

The Government has informed us that they do not object to this application.

Respectfully,
/s/
Harvey Fishbein

Cc: All parties (by ECF)